

TO: All Generators and Treatment, Storage and Disposal Facilities of Hazardous Waste

FROM: Cherrie F. Plummer, Bureau of Remediation & Waste Management (207) 287-7882

DATE: January 19, 2006

RE: 2005 Annual Hazardous Waste Report

Maine's Hazardous Waste Management Rules (the "Rules"), Chapters 851 and 854, require hazardous waste generators and treatment, storage and disposal facilities (TSDs) to submit a hazardous waste activity report to the Department of Environmental Protection annually. The Rules require the report to be submitted by March 1, for each calendar year.

The Department will collect the reports in two ways for this reporting cycle. First, TSDs and sites that meet the definition of a RCRA Large Quantity Generator (VLQG on the 2004 Manifest Summary) will be asked to complete the federal US EPA report form, "2005 Hazardous Waste Report – Instructions and Forms" (EPA Form 8700-13A/B).

The Department is mailing the 2005 Hazardous Waste Report along with this letter to those facilities that are TSDs, that are listed as a RCRA LQG in our database, or that identified themselves as VLQGs on the 2004 Manifest Summary.

A RCRA Large Quantity Generator (VLQG on the 2004 Manifest Summary) means:

- (a) 1000 kilograms (2200 pounds) or more of hazardous waste was generated at the site in any single month;
- (b) 1 kilogram (2.2 pounds) of acute hazardous waste (P-listed wastes and F-listed wastes F020 - F027) was generated at the site in any single month, or accumulated at any time; or
- (c) More than 100 kilograms (220 pounds) of spill cleanup material contaminated with acute hazardous waste was generated at the site in any single month or accumulated at any time.

The 2005 Hazardous Waste Report – Instructions and Forms is similar to the 2003 Hazardous Waste Report. If you have any questions about whether something needs to be reported, or how to complete the forms, please contact either Cherrie Plummer at (207) 287-7882 or Kevin Jenssen at (207) 287-3546 for assistance. If your facility is listed as either a TSD or an LQG in the EPA RCRA database, you should have received a CD containing the 2005

Hazardous Waste Report – Instructions and Forms with this letter. If you are unable to use the CD, you may contact the Department for a paper version or go to EPA's website <http://www.epa.gov/epaoswer/hazwaste/data/br05/forms.htm> to obtain the booklet.

Second, all other Maine generators required to submit a hazardous waste report will be sent a manifest summary report based on the 2005 hazardous waste manifests and Uniform Bills of Lading submitted to the Department. They will be asked to verify the manifest information is correct, report any waste treatment, storage or disposal on the site of generation, report universal waste handling, and return the report to the Department. The Department will mail the report out later in the year. This report is usually due after March 1 to allow time for review.

The instructions for the 2005 Hazardous Waste Report clarifies that hazardous waste which is directly imported from or exported to a foreign country should not be reported on the Hazardous Waste Report since this import and export information is reported directly to the US Environmental Protection Agency. However, Chapter 857, Section 7(D) of Maine's Hazardous Waste Management Rules requires generators to submit copies of all notices, reports, manifests and other documents filed with the US Environmental Protection Agency relating to import and export of hazardous waste to the Department. Mail these copies to the Department's Augusta address to the attention of Cherrie Plummer.

Universal Waste Reporting

Generators of hazardous waste that are required to submit the annual hazardous waste report to the Department must include information about universal wastes. Universal wastes include lamps containing mercury or lead, PCB ballasts, mercury thermostats, cathode ray tubes, certain batteries and mercury thermometers. Lead-acid batteries from motor vehicles do not need to be reported on this form. Sites required to complete the 2005 Hazardous Waste Report will receive a form for reporting universal waste with this letter. Sites receiving the manifest summary will report their universal waste activities at that time.

Solvent-Contaminated Wipes Guidance

The Department adopted guidance in 2005 that will allow alternative management of wipes providing the guidance criteria are followed. If your facility is following the guidance, then it needs to complete the one page form describing the quantity of solvent contaminated wipes being managed under the guidance. The guidance can be found on the Department's website at www.maine.gov/dep/rwm/publications/pdf/wipesfinal.pdf.

Electronic Reporting

Environmental Support Solutions, Inc. will again offer free Waste Reporter software that Maine LQGs and TSDFs may download and use in preparing their site's Hazardous Waste Report. Waste Reporter can be downloaded at: http://www.environ.com/software_waste_reporter.asp. Questions about downloading, installing, and running Waste Reporter software should be directed to Environmental Support Solutions.

The State of Florida also provides free software for electronic reporting. The software, webBR2005.exe, can be downloaded at http://www.dep.state.fl.us/waste/categories/hazardous/pages/BRS_data.htm. If you have questions about the Florida software, Maine DEP staff will do its best to assist you. Please do not contact Florida DEP directly.

Sites that choose to submit electronically must include a signed paper copy of the Site Identification Form and a paper copy of the Universal Waste Reporting Form. Please do not report universal wastes on the Waste Generation and Management (Form GM) Form.

When and Where Reports Are Due

Completed forms, either paper or electronic, must be returned by **March 1, 2006**, to:

Department of Environmental Protection
Bureau of Remediation & Waste Management
17 State House Station
Augusta, Maine 04333-0017
ATTN: 2005 Annual Hazardous Waste Report

Sites that choose to submit electronically must include a signed paper copy of the Site Identification Form.

If you have any questions regarding the 2005 Annual Hazardous Waste Report or the 2005 Manifest Summary, please contact Cherrie Plummer at (207) 287-7882 or Kevin Jenssen at (207) 287-3546.